

From: Steven S. Biss <stevenbiss@earthlink.net>

Sent: Monday, May 18, 2020 8:27 PM

To: D. Margeaux Thomas <mthomas@thomaslawplc.com>

Cc: Trevor Fitzgibbon <TrevorFG@protonmail.com>

Subject: Morgan Deposition

Margeaux,

Mr. Morgan is all set for Thursday. We need specific instructions from you how and when to connect.

June 10 is confirmed for Trevor's deposition.

Steven S. Biss

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From: [Steven S. Biss](#)
To: [D. Margeaux Thomas](#)
Cc: [Maya Srour](#); [Trevor Fitzgibbon](#)
Subject: Re: Deposition Dates
Date: Monday, May 18, 2020 12:19:40 PM

Margeaux,

I will confirm May 21 with Mr. Morgan.

June 9-11 work for Trevor's deposition. Let me know what day you prefer.

During the telephonic hearing with the Judge, he directed you to determine how Radack obtained Mr. Morgan's email address. Please let me know the answer ASAP.

Finally, I am filing the third amended complaint today and I know you have to refile your 12b1 motion and brief an issue on resulting damages. Plaintiff has decided to pursue his breach of contract claim and drop the fraud in the inducement claim. As a courtesy, I wanted you to know that the third amended complaint will not include a claim of fraud in the inducement.

Call or email me if you have any questions.

From: D. Margeaux Thomas
Sent: Monday, May 18, 2020 11:55 AM
To: Steven S. Biss
Cc: Maya Srour
Subject: RE: Deposition Dates

I would like to schedule Eric on 5/21. We will need another date for Trevor, I cannot do 5/27. Does June 8-11th work for you and Trevor?

Thank you,

D. Margeaux Thomas



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From: Steven S. Biss <stevenbiss@earthlink.net>
Sent: Saturday, May 16, 2020 4:28 PM
To: D. Margeaux Thomas <mthomas@thomaslawplc.com>
Subject: Re: Deposition Dates

Margeaux,

Eric Morgan is available on 5/21. Trevor can do 5/21 or 5/27. Does that work for you?

From: D. Margeaux Thomas
Sent: Saturday, May 16, 2020 8:09 AM
To: Steven S. Biss
Subject: RE: Deposition Dates

Thank you. We will circulate a notice of deposition.

Thank you,

D. Margeaux Thomas



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From: Steven S. Biss <stevenbiss@earthlink.net>
Sent: Friday, May 15, 2020 3:12 PM
To: D. Margeaux Thomas <mthomas@thomaslawplc.com>
Cc: Trevor Fitzgibbon <TrevorFG@protonmail.com>
Subject: Re: Deposition Dates

Margeaux,

The 21st works for Trevor, but the 28th does not work for me.

I am waiting to hear from Eric Morgan re his available dates in May. Will get those to you

ASAP.

Call or email me if you have any questions.

Have a good weekend.

From: D. Margeaux Thomas
Sent: Friday, May 08, 2020 12:39 PM
To: Stevenbiss@earthlink.net
Cc: Maya Srour
Subject: Deposition Dates

Steven,

Can your client be available for a remote video deposition on May 21st? I would also like to propose May 28th for Eric Morgan's deposition. Please advise if these dates work.

Thank you,

D. Margeaux Thomas



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